

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

REBECCA FRANKENSTEIN,

Defendant.

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4:22CR3154

**MOTION FOR TEMPORARY
RELEASE UNDER SPECIFIED
CONDITIONS**

COMES NOW, Rebecca Frankenstein, by and through counsel of record, Jonathan M. Braaten, and moves this Court to authorize her temporary release from custody so that she may attend the funeral of her sister, Jessica Honnen. In support of this Motion, the Defendant states as follows:

1. Jessica Honnen passed away on November 5, 2023. Her inurnment is at the Camden Cemetery, Milford, Nebraska on November 25, 2023 from 1:00 p.m. to 2:00 p.m. That there is a reception following the inurnment at the Chateau La Fluer apartments clubhouse, 1025 N. 63rd Street, Lincoln, Nebraska, from 2:00 p.m. to 5:00 p.m.

2. The Defendant seeks an Order temporarily releasing her from the Phelps County jail on November 25, 2023 at 9:00 a.m. to attend the inurnment and reception. The Defendant would return to the Phelps County jail on November 25, 2023, no later than 8:00 p.m. Ms. Patti North-Kersey, the Defendant's mother, agrees to provide the transportation and remain with her throughout the entirety of her release.

3. AUSA Martin Conboy is opposed to this motion.

WHEREFORE, Rebecca Frankenstein respectfully requests that the Court temporarily release her from custody to permit her to travel to, and attend, the inurnment and reception for Jessica Honnen as stated more fully above.

DATED this 20th day of November, 2023.

REBECCA FRANKENSTEIN, Defendant



JONATHAN M. BRAATEN, #22163
ANDERSON, CREAGER &
WITTSTRUCK, P.C.
1601 Old Cheney Road
Lincoln, NE 68512
(402) 477-8800
jbraaten@acwlaw.com
Attorney for Defendant

CERTIFICATE OF SERVICE

Jonathan M. Braaten hereby certifies that the foregoing document was filed with the Clerk of the District Court using the CM/ECF system which sent notification of such filing to AUSA Martin Conboy on this 20th day of November, 2023.



By:

JONATHAN M. BRAATEN, #22163